

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
	:	
<b>v.</b>	:	<b>DATE FILED</b> _____
	:	
<b>MICHAEL ARLEN DESILVA, JR.,</b>	:	<b>VIOLATIONS:</b>
<b>a/k/a "Mike," and</b>	:	<b>21 U.S.C. § 846</b>
<b>TAMIR RASHEED JACKSON,</b>	:	<b>(Conspiracy to possess with intent to</b>
<b>a/k/a "Tymir Watkins,"</b>	:	<b>distribute 50 grams or more of</b>
<b>a/k/a "Tamir Eure,"</b>	:	<b>cocaine base ("crack") and 1000</b>
<b>a/k/a "Saleem Nicholson,"</b>	:	<b>grams or more of heroin within 1000</b>
<b>a/k/a "Rasheed Washington,"</b>	:	<b>feet of a public housing project -</b>
<b>a/k/a "Money,"</b>	:	<b>1 count)</b>
	:	<b>21 U.S.C. 841(a)(1) and (b)(1)(A)</b>
	:	<b>(Possession with intent to distribute</b>
	:	<b>50 grams or more of cocaine base</b>
	:	<b>("crack") - 1 count)</b>
	:	<b>18 U.S.C. § 924(c)(1)</b>
	:	<b>(Possession of a firearm in</b>
	:	<b>furtherance of a drug trafficking</b>
	:	<b>crime - 1 count)</b>
	:	<b>18 U.S.C. § 922(g)(1)</b>
	:	<b>(Possession of a firearm affecting</b>
	:	<b>commerce by a convicted felon -</b>
	:	<b>2 counts)</b>
	:	<b>18 U.S.C. § 2 (Aiding and abetting)</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From at least in or about April 2000, through on or about February 14, 2003,  
at Easton, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MICHAEL ARLEN DESILVA, JR.,**  
**a/k/a "Mike," and**

**TAMIR RASHEED JACKSON,  
a/k/a “Tymir Jatkins,”  
a/k/a “Tamir Eure,”  
a/k/a “Saleem Nicholson,”  
a/k/a “Rasheed Washington,”  
a/k/a “Money”**

conspired and agreed, with each other, and with others known and unknown to the grand jury, to knowingly and intentionally distribute and to possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and 1000 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1000 feet of the Delaware Terrace housing project, real property comprising a housing facility owned by a public housing authority, in Easton, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 860.

**MANNER AND MEANS**

2. It was part of the conspiracy that defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON were members of a drug organization that distributed cocaine base ("crack") and heroin, as well as other controlled substances, that is, cocaine, marijuana, 3, 4 methylenedioxymethamphetamine (MDMA, known as “ecstasy”), and phencyclidine (PCP) from various locations in and around Easton, Pennsylvania.

It was further a part of the conspiracy that:

3. Defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON, and other members of the organization obtained bulk quantities of cocaine, heroin, and

other controlled substances in New York and New Jersey, and transported those controlled substances to the Easton area.

4. Defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON, and other members of the organization also obtained controlled substances in the Easton area and distributed them to buyers.

5. Defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON possessed and carried firearms to further the goals of the drug trafficking organization.

6. Defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON, and other members of the organization, sold and distributed these controlled substances in and within 1000 feet of real property comprising the Delaware Terrace public housing project, a housing facility owned by a public housing authority in Easton, Pennsylvania.

#### OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere, by at least one member of the conspiracy:

1. On or about November 10, 2000, at Easton, defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON possessed with intent to distribute approximately 61.8 grams of cocaine, approximately 0.83 grams of heroin, and approximately 5.8 grams of “crack” cocaine base, and possessed approximately 93 rounds of .22 caliber ammunition, cellular telephones, drug paraphernalia, and a firearm, that is, a .40 caliber Glock handgun, and possessed approximately \$1,859 in U.S. currency.

2. On or about November 10, 2000, at Easton, defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON both threatened violence on the police officers who arrested them.

3. On or about April 25, 2001, at Easton, defendant MICHAEL ARLEN DESILVA, JR. sold and distributed approximately 4 grams of “crack” cocaine base to a person known to the grand jury, for \$500.

4. In or about June 2001, at Easton, defendant MICHAEL ARLEN DESILVA, JR. possessed a .22 caliber semi-automatic handgun, which DESILVA stated he had purchased for 15 grams of cocaine.

5. On or about August 22, 2001, at Easton, defendant TAMIR RASHEED JACKSON sold and distributed approximately 0.4 grams of heroin, and approximately 0.67 grams of “crack” cocaine base to a person known to the grand jury, for \$185.

6. On or about September 19, 2001, at Easton, defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON sold and distributed approximately 0.4 grams of heroin, and approximately 6.1 grams of “crack” cocaine base to a person known to the grand jury, for \$385.

7. On or about October 3, 2001, at Easton, defendants MICHAEL ARLEN DESILVA, JR. and TAMIR RASHEED JACKSON sold and distributed approximately 5.1 grams of “crack” cocaine base to a person known to the grand jury, for \$300.

8. On or about November 5, 2001, at Easton, defendant MICHAEL ARLEN DESILVA, JR. discussed the sale and distribution of approximately 14 grams of “crack” cocaine base to a person known to the grand jury, for \$520.

9. On or about January 2, 2002, at Easton, defendant MICHAEL ARLEN DESILVA, JR. discussed the sale and distribution of approximately 7 grams of “crack” cocaine base to a person known to the grand jury, for \$250.

10. On or about August 1, 2002, defendant MICHAEL ARLEN DESILVA, JR. stated to a person known to the grand jury that DESILVA planned to replenish his supply of “crack” cocaine base, and further warned the person not to sell drugs to another person known to the grand jury, opining that the latter person was an informant cooperating with federal authorities.

11. On or about August 28, 2002, two persons known to the grand jury discussed the delivery of “bundles” of controlled substances from New York to defendants MICHAEL DESILVA, JR., and TAMIR JACKSON in Easton.

12. On or about February 14, 2003, at Allentown, defendant TAMIR RASHEED JACKSON possessed with intent to distribute approximately 199 grams of “crack” cocaine base, and possessed approximately \$737 in U.S. currency, and a firearm, that is, a .40 caliber Glock handgun.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 10, 2000, at Easton, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL ARLEN DESILVA, JR.,  
a/k/a "Mike," and  
TAMIR RASHEED JACKSON,  
a/k/a "Tymir Jatkins,"  
a/k/a "Tamir Eure,"  
a/k/a "Saleem Nicholson,"  
a/k/a "Rasheed Washington,"  
a/k/a "Money,"**

knowingly possessed a firearm, that is, a .40 caliber Glock model 22, serial number ARC544, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute and to possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, and 1000 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1000 feet of a housing facility owned by a public housing authority, as charged in Count One of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 10, 2000, at Easton, in the Eastern District of Pennsylvania,  
defendants

**MICHAEL ARLEN DESILVA, JR.,  
a/k/a "Mike," and  
TAMIR RASHEED JACKSON,  
a/k/a "Tymir Watkins,"  
a/k/a "Tamir Eure,"  
a/k/a "Saleem Nicholson,"  
a/k/a "Rasheed Washington,"  
a/k/a "Money,"**

both having been convicted in courts of the State of New Jersey of a crime punishable by  
imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and  
foreign commerce a firearm, that is, a .40 caliber Glock handgun, model 22, serial number ARC544.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 14, 2003, at Allentown, in the Eastern District of Pennsylvania,  
defendant

**TAMIR RASHEED JACKSON,  
a/k/a "Tymir Watkins,"  
a/k/a "Tamir Eure,"  
a/k/a "Saleem Nicholson,"  
a/k/a "Rasheed Washington,"  
a/k/a "Money,"**

knowingly and intentionally possessed with intent to distribute 50 grams or more, that is,  
approximately 199 grams, of a mixture or substance containing a detectable amount of cocaine base  
("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).



**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 14, 2003, at Allentown, in the Eastern District of Pennsylvania,  
defendant

**TAMIR RASHEED JACKSON,  
a/k/a “Tymir Watkins,”  
a/k/a “Tamir Eure,”  
a/k/a “Saleem Nicholson,”  
a/k/a “Rasheed Washington,”  
a/k/a “Money,”**

both having been convicted in courts of the State of New Jersey of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a loaded 10mm caliber Ruger handgun, model P89, serial number 315-01734.

In violation of Title 18, United States Code, Section 922(g)(1).

**A TRUE BILL:**

---

**GRAND JURY FOREPERSON**

---

**PATRICK L. MEEHAN**  
*United States Attorney*